

WARNER & SCHEUERMAN
Attorneys at Law
6 West 18th Street, 10th Floor
New York, New York 10011
Tel: (212) 924-7111
Fax: (212) 924-6111

Jonathon D. Warner, Esq.
jdwarner@wslaw.nyc

Karl E. Scheuerman, Esq.
kescheuerman@wslaw.nyc

April 17, 2023

VIA ECF

Pamela K. Chen, U.S.D.J.
United States District Court, Eastern District of New York
225 Cadman Plaza East, Courtroom 4F North
Brooklyn, New York 11201-1804

Re: *IME Watchdog, Inc. v. Gelardi, et al.*
Case No.: 1:22-cv-1032 (PKC)(JRC)

Dear Judge Chen:

We represent defendants Safa Gelardi, Vito Gelardi and IME Companions LLC and write in opposition to plaintiff's request to serve its proposed cover letter with the court-approved notice. Plaintiff's proposed cover letter is entirely inappropriate and contains language which is similar (if not identical) to language which this Court has already stricken from plaintiff's proposed court-approved notice. Plaintiff is asking to for permission to serve such a cover letter in order to get around your Honor's prior rulings with respect to the court-approved notice.

There is simply no reason for any cover letter to go into the details of plaintiff's allegations or to include any alleged judicial findings concerning defendants' alleged wrongdoing. Nor should any cover letter contain allegations, accusations, alleged judicial findings and other alleged information about this legal proceeding. In any event, we do not believe that any cover letter is necessary. The court-approved notice speaks for itself.

Respectfully yours,

/s/ Jonathon D. Warner

JDW/ks

cc: All counsel (via ECF)